



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE
JACKSON, TENNESSEE 38305-4316
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283**

August 12, 2016

**Wendy Rhyne, MS4 Program Manager
City of Jackson
117 E. Main Street, Ste. 206
Jackson, Tennessee 38301**

**REF: MS4 Meeting Follow-up Letter
Permit No.: TNS075361
Madison County**

Dear Wendy,

On Thursday, August 4, 2016, I met with you to discuss the current well-being of the City of Jackson's (City) MS4 Program. I very much appreciated your time and considered the meeting profitable for me in the understanding of the internal workings of the City's stormwater program.

A few meeting highlights are as follows:

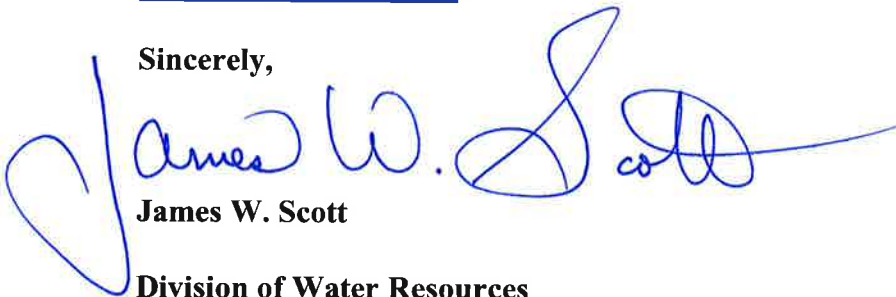
- 1. We both acknowledged the City's failure to meet the sampling requirements of the 2010 MS4 Permit. To your credit, you had prepared a commitment to complete all required sampling within the June through August sampling window of 2017. We both acknowledged that the sampling window for 2016 is almost closed and since the City has no lab already on contract, the evaluation period would be closed before a contractor could be hired and execute the task.**
- 2. The City of Jackson has made or is in the process of making changes in the stormwater responsibilities assigned to those individuals that administer the program. The reorganization is too new to be able to measure any benefit due to the changes. Whether or not the changes result in measureable benefits, I am encouraged that your City Engineer, Scott Chandler desires to improve the program and is willing to experiment to accomplish that goal. I wish him well in this endeavor along with the entire stormwater staff.**
- 3. In context of all that has transpired with the development process of the (still pending) 2016 Phase II, MS4 Permit, it is understandable that the City has not acted on submitting a new ordinance to Jackson's City leaders regarding the proposed "Permanent Best Management Practices" (BMP) contained in the DRAFT Permit. This is obviously a topic for future discussion once the permit is finalized.**

4. We again reviewed the concept of "Hot Spots" within the context of the MS4 Permit. Without rehearsing all that we discussed, I considered the discussion very profitable.
5. We also reviewed the status of the City's mapping development of the stormwater system. Your openness was appreciated. I understood you to say that the City is making progress but the progress is slow. The City is currently limited to the resources it has available to address the mapping needs. The City's mapping resources are not only for the stormwater system, but for other needed City infrastructure.
6. Your explanation of the plans review process was extremely helpful. The process appears very thorough and comparable to other "well respected" MS4 communities in West Tennessee.
7. I was very pleased to be informed that you will be able to attend the TNSA Annual Conference this year at Falls Creek Falls State Park. As I stated during our discussion, you could do a session on promoting stormwater awareness. I have seen several presentations over the last two years of attendance and your would be superior to the ones that I have attended.

Again, I considered this meeting very profitable, at least for me. I look forward to working more closely with you and anyone with the City of Jackson's MS4 program. As I stated, if any issue arises that you need the support from the Division of Water Resources, do not hesitate to contact us.

If you have any questions concerning this correspondence or if I may assist in any other area of concern, please feel free to contact by phone at 731-512-1362 or by email at James.W.Scott@tn.gov.

Sincerely,



James W. Scott

Division of Water Resources
Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, Tennessee 38305

Cc

Scott Chandler, PE, City Engineer
City of Jackson
117 E. Main Street, Suite 206
Jackson, Tennessee 38301

Outline – City of Jackson MSA Meeting – August 4, 2016

1. Status of Permit Sampling and/or VSA

- a. 5.1. Analytical Monitoring: June 2017-September 2017
- b. Non-analytical Monitoring may not be contracted out. Impaired stream segment?
- c. Contract TEC Environmental Labs, 2269 Dr F E Wright Dr, Jackson, TN 38305 · (731) 423-5330
- d. Draft 2016 303(d) was available July 27, 2016

2. Plans Review Process

- a. See attached sheet
- b. Engineering – Stormwater review only –
- c. Checks erosion drainage control plan to see if it is adequate
- d. Engineering – Checks no net increase requirement – pre-development/post development runoff requirement for 2,5,10 year storms
- e. TDEC has already checked sediment basin requirements
- f. City has detention basin requirements in subdivision regulations.
- g. City has own buffer requirements. TDEC's buffer requirements go away after construction is complete.
- h. When we receive NOC, site has met approval from TDEC
- i. Plans are approved contingent on TDEC's NOC.

3. Jackson's Status – Waiting on new permit language: Phase II General NPDES Permit and General NPDES Permit for Storm Water Discharges Associated with Construction Activity

- a. Permanent BMP Ordinance – Rules and Regulations for the Control of Soil Erosion and Stormwater. These Rules and Regulations are promulgated pursuant to City of Jackson Code of Ordinances, Title 14, Chapter 5, titled “EROSION AND STORMWATER CONTROL”.
- b. Scott has not noticed a 1” capture requirement on TDEC review.

4. Hot Spots - Commercial Inspections

- a. Notice of Coverage (NOC)
- b. Receiving water named
- c. Impaired? Yes or No
- d. Inspections – Active site – Twice weekly

(See <http://www.cityofjackson.net/planning/forms-documents>)

**Subdivision and Land Development Regulations
City of Jackson, Tennessee and Planning Region**

Adopted: January 7, 2009

General Criteria for Review and Approval:

1. Pre-application Conference with Planning Department and Engineering Department.
2. File Preliminary Subdivision Plat to Planning Department
3. Review and Approve Preliminary Subdivision Plat
 - a. Upon acceptance of a complete application, the Planning Staff shall forward the plat and related information to the following review agencies as appropriate:
 - (1) Engineering Staff
 - (2) City Forester
 - (3) Planning Staff
 - (4) Jackson Energy Authority Engineering Staff
 - (5) AT&T Telephone Company
 - (6) Madison County Highway Department
 - (7) Southwest Electric Membership Cooperative
 - (8) Tennessee Department of Transportation, when such application affects a road maintained by the State of Tennessee
 - (9) Any other Federal, State, or Local Agency that may have cause to review the application
 - b. The Planning Staff shall coordinate the review by referral agencies and compile their comments.
4. File Construction Drawings to Planning Department
5. Review and Approval of Construction Drawings
 - a. Detailed Staff review of construction drawings. All construction drawings shall provide all the facts necessary to show compliance with these Subdivision and Land Development Regulations.
6. Required Construction Notes on Construction Drawing from Engineering Department and JEA
7. Review and Approval of Final Subdivision Plat

5. Work in progress

- a. Currently, Patrick adding detention ponds to SW GIS map.
- b. Project – Locate and Log SW Outfall Sizes to add to GIS map.

6. Positives –

- a. HHW Collection Event –
 - i. Fall 2016 – October 29, 2016
 - ii. Spring 2017 – April 22, 2017
- b. Westwood Summer Camp Sponsor – Summer 2016
- c. Medicine PSA - West Tennessee State Fair - September 2016
- d. Public Events
- e. TNSA membership
- f. Joined Tennessee Communities Sustainability e-mail group for MS4s
- g. Earth Day Festival – April 23, 2017
 - i. Clean Water Runoff 5K/Color Run 1mile
 - ii. Festival
 - iii. HHWC
 - iv. Citywide Yard Sale

Site Development Permit
For Land Disturbance Activities
City of Jackson

Under authority of the Code of Ordinances of the City of Jackson, Tennessee, Title 14, Chapter 5, "Erosion and Stormwater Control", the person identified below as the Permittee is hereby authorized to perform the land disturbance activities described herein in accordance with Section II, "Permit Conditions", of this Permit.

Section I : General:

Permittee:

Name: _____ Company: **GAT Development**
Address: **2574-H Christmasville Cove** Phone (Work): _____
Phone (Cell): _____ Fax: _____

Development Activity: ☐ Residential Subdivision ☐ Commercial Subdivision
☐ Residential Dwelling Single ☒ Commercial Establishment
☐ Residential Dwelling Complex ☐ Community Establishment
☐ Tree Removal ☐ Property Grading/Clearing

Work Location 911#. **8** Street Name: **Lanese Dockery Drive**

Subdivision/Development: **Wolfe Subdivision**

Section/Phase: _____

Lot/Tract #: _____

Total Acres To Be Disturbed: **0.90**

Erosion and Drainage Control Plan (EDCP) Fee **\$25.00**

Vegetative Impact Evaluation (VIE) Fee _____

Total Permit Fee: _____ (\$25.00 minimum)

Section II Permit Terms & Conditions:

1. It is the permittee's responsibility to insure proper protection of significant trees cited for preservation as a part of the approved VIE during development activities.
2. Erosion Control Measures must be properly installed and functional prior to initiating clearing and/or grading activities. For Residential & Commercial Subdivisions and Community & Commercial Establishments, initial erosion control measures must be in accordance with the Erosion and Drainage Control Plan (EDCP), approved by the Office of the City Engineer. For Residential Dwellings and Property Grading/Clearing activities, erosion control measures must incorporate Best Management Practices to prevent soil from being washed or tracked from the site.
3. The Tennessee Department of Environment and Conservation (TDEC) Erosion & Sediment Control Handbook, Second Edition, March 2002, or subsequent edition will be used as the reference for Best Management Practices for erosion control.
4. Erosion control measures must be inspected after each rainfall event and repaired or improved as necessary to prevent soil from being washed or tracked from the site.
5. Clearing and grading must be held to the minimum necessary to accomplish the development/construction activity. Topsoil, stockpiled during grading, must be stabilized using hay bales, silt fence, impervious cover or a combination of these measures until the topsoil is needed for re-use.
6. A rock/stone driveway(s) will be required for ingress and egress to the construction site from streets.

7. It is the Permittee's responsibility to insure that delivery trucks and/or sub-contractors schedule and conduct activities on the construction site such that erosion control measures are not disturbed or otherwise made ineffective and such that soil is not tracked onto the street.
8. Any soil or debris washed or tracked from the construction site to any street or storm drain must be cleaned up immediately by means other than washing the material into the storm drain. Washing the material into the storm drain will constitute a violation of City Ordinances and State Environmental Laws.
9. It is the Permittee's responsibility to insure that the construction site and adjoining property is kept free of trash, litter and construction debris. These materials must be picked up and properly containerized daily to prevent the creation of safety and/or health hazards. Open burning of any material on building sites within the City Limits is prohibited except in accordance with an open burning permit issued by the Jackson Fire Department.

Section III – Permit Termination:

1. A request submitted by the Permittee to the Building Department for a Final Building (Certificate of Occupancy) Inspection will constitute a request for termination of this Development Permit. Issuance of the Certificate of Occupancy will terminate this Development Permit.
2. A request submitted by the Permittee to the Planning Department for approval of the Final Plat for a Residential or Commercial Subdivision will constitute a request for termination of this Development Permit. Approval of the Final Plat will terminate this Development Permit.
3. A request submitted to the City Engineer's office for a Final Inspection will constitute a request for termination of this Development Permit if the Permit is for grading/clearing/tree removal only.
4. No Certificate of Occupancy, Final Plat or Final Inspection will be approved until such time as the following conditions are met:
 - a. Permanent vegetation has been re-established on all disturbed areas of the construction site or the soil of the construction site has been stabilized using Best Management Practices outlined in the TDEC, Erosion and Sediment Control Handbook such that soil erosion will not occur.
 - b. All streets, curbs & gutters, stormwater inlets and stormwater piping have been cleaned of soil and/or construction debris resulting from activities on the construction site.

Section IV – Permit Enforcement:

1. Failure of the Permittee to fully comply with the terms & conditions outlined in Section II of this permit will result in the issuance of a "stop work" order and a compliance deadline by either City Stormwater Management Personnel or the City Forester.
2. Failure of the Permittee to fully comply with the "stop work" order and/or the compliance deadline will result in the Permittee being cited into City Court for assessment of applicable fines and/or damages.

I hereby certify that I have read and understand all sections of this document and that I will comply with the Terms and Conditions of this Permit.

Name: _____ Date: _____

Termination approved by: _____ Date: _____

Termination approved by: _____ Date: _____



TDEC - Division of Water Resources
Jackson Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TNS075361	Facility Site Name:	City of Jackson	
		Address:	117 E. Main Street, Jackson, Tennessee 38301	
Permit Eff. Date:	May 17, 2011	Permit Exp Date:	Sep 1, 2015	SIC Code:

Compliance Monitoring Information

Compliance Monitoring Activity Name:	Stormwater MS4 Non-Sampling		
	* If Bio Monitoring is selected above, select the method used:		
Compliance Monitoring Activity:	Evaluation		

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	08/04/2016 9:00	Exit Date/Time (mm/dd/yyyy hh:mm):	08/04/2016 11:30
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Facility Representatives

Wendy Rhyne, MS4 Program Manager, 731.425.8217	Jerry Gist, Mayor 731.425.8220
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act		
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)				
Compliance Monitoring Reason:	Core Program				
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR		
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	3	Hours:	
Inspection Type:	State	Compliance Monitoring Action Outcome:	Under Review		
Lead Agency:	State	Compliance Monitoring Rating Code:	Marginal		
If Joint Inspection, what was the purpose of the other party?					

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input checked="" type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

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EPA and State Representatives

Inspector's Signature

Agency / Office / Phone

Date

Manager's Signature

Agency / Office / Phone

Date

(Note: This form can only be printed to an XPS document, then saved for later use.)